

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
v.	)	CR. NO. 2:05-cr-122-T
	)	
PATRICIA ANN CANTALINE	)	

**UNITED STATES' MOTION FOR DOWNWARD DEPARTURE**  
**FOR ACCEPTANCE OF RESPONSIBILITY**

Comes now the United States of America, by and through Leura Garrett Canary, United States Attorney for the Middle District of Alabama, and respectfully moves this Court to reduce by one (1) level Defendant's offense level based on Defendant's acceptance of responsibility. As grounds for this Motion, the United States avers as follows:

1. A grand jury sitting in the Middle District of Alabama returned an indictment against Defendant on May 25, 2005.
2. After appearing before this Court on July 13, 2005, Defendant notified the United States of Defendant's intent to plead guilty to the indictment sufficiently early to permit the government to avoid preparing for trial and to allocate its resources efficiently. Defendant pled guilty to the indictment on October 3, 2005.
3. Therefore, pursuant to United States Sentencing Guidelines § 3E1.1(b), as amended, the United States makes this formal motion for a one-level reduction in Defendant's offense level for acceptance of responsibility such that the total reduction in offense level for Defendant's acceptance of responsibility shall be three (3) levels.

WHEREFORE, the United States respectfully requests that this Motion be GRANTED.

Respectfully submitted this the 20<sup>th</sup> day of December, 2005.

LEURA GARRETT CANARY  
UNITED STATES ATTORNEY

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KENT B. BRUNSON  
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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kevin L. Butler.

Respectfully submitted,

LEURA GARRETT CANARY  
UNITED STATES ATTORNEY

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